



**RHODE ISLAND**

**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

March 23, 2005

Curt Frye, Remedial Project Manager  
U.S. Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway  
Code 1823-Mail Stop 82  
Lester, PA 19113-2090

RE: Technical Memorandum for Supplemental Soil Investigation, Additional Borings Old Fire  
Fighter Training Area, Naval Station Newport, Newport, Rhode Island

Dear Mr. Frye,

The Rhode Island Department of Environmental Management, Office of Waste Management has received the Technical Memorandum for Supplemental Soil Investigation, Additional Borings, Old Fire Fighter Training Area, dated March 17, 2005.

The memorandum was submitted for review approximately seven working days prior to the scheduled start date for fieldwork. The Office of Waste Management is concerned with the submission of a work plan for review immediately prior to the work being performed. This approach does not allow for an adequate review by the regulators and /or response to comments and modification of the document by the Navy. In addition, the late submission date does not appear to be justified as the work plan notes that the need for additional borings was ascertained after a review of the Predesign Report, produced in July 2004, comments on the Predesign Report, comments were submitted in September of 2004, and the mound removal, central mound removal where the majority of the samples are proposed was completed in November 2004.

In general it is not clear from the submission whether the proposed effort is designed to fine tune the proposed removal action, that is provide a more "detailed" picture of the nature and extent of contamination, and/or add or delete areas which require remediation. If the effort is designed to fine tune the removal action experience has shown that the "detailed" extent of contamination is uncovered during the removal action itself and a tighter preexcavation boring density has often been found to have limited utility. This would bring into question the need to perform an additional investigation. If the effort is designed to eliminate areas of concern, additional borings beyond that proposed will be needed to eliminate a particular area. The proposed sampling effort, however, may have some utility in identifying additional areas, which may require remediation.

In regards to the proposed locations for the individual borings the Navy has not included a table and/or a discussion providing the justification for the individual boring location. This information is typically provided with all work plans as it allows the regulators to evaluate the rationale for proposed

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30% post-consumer fiber

sample location. As this information was not submitted the Office of Waste Management is not able to determine whether the additional borings are in the correct location and/or are even needed.

Please clarify the intent of the investigation. Also with respect to the individual borings, please provide the rationale for the borings locations with sufficient time for regulatory review and Navy response prior to that start of any field activities.

If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa  
Office of Waste Management

cc: Matthew DeStefano, DEM OWM  
Richard Gottlieb, DEM OWM  
Kymberlee Keckler, EPA Region I  
Cornelia Mueller, NSN